

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF COLUMBIA	)	
GAS OF KENTUCKY, INC. FOR AN	)	
ADJUSTMENT OF RATES; APPROVAL OF	)	CASE NO.
DEPRECIATION STUDY; APPROVAL OF	)	2021-00183
TARIFF REVISIONS; ISSUANCE OF A	)	
CERTIFICATE OF PUBLIC CONVENIENCE	)	
AND NECESSITY; AND OTHER RELIEF	)	

COMMISSION STAFF’S POST-HEARING REQUEST FOR INFORMATION  
TO COLUMBIA GAS OF KENTUCKY, INC.

Columbia Gas of Kentucky, Inc. (Columbia Kentucky), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due no later than November 19, 2021. The Commission directs Columbia Kentucky to the Commission’s July 22, 2021 Order in Case No. 2020-00085<sup>1</sup> regarding filings with the Commission. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

Each response shall include the question to which the response is made, and shall include the name of the witness responsible for responding to the questions related to the information provided. Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or the

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<sup>1</sup> Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC July 22, 2021), Order (in which the Commission ordered that for case filings made on and after March 16, 2020, filers are NOT required to file the original physical copies of the filings required by 807 KAR 5:001, Section 8).

person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

Columbia Kentucky shall make timely amendment to any prior response if Columbia Kentucky obtains information that indicates the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which Columbia Kentucky fails or refuses to furnish all or part of the requested information, Columbia Kentucky shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. When filing a paper containing personal information, Columbia Kentucky shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Refer to the Rebuttal Testimony of Vincent R. Rea (Rea Rebuttal Testimony), page 71. Provide support for the proposed 1.30 percent short-term cost of debt.

2. Refer to the Direct Testimony of Vincent V. Rea (Rea Direct Testimony), page 49. Provide an update to Table VVR-5 based upon the most recent Value Line Investment Survey.

3. Refer to the Rea Rebuttal Testimony, Attachment Rebuttal VVR-6R. Provide support for the proposed cost of long-term debt of 3.30 percent for the forecasted March 2022 and June 2022 issuances.

4. Refer to Columbia Kentucky's response to Commission Staff's Third Request for Information (Staff's Third Request), Item 4, Attachment C. Provide the supporting documentation to support the cost-per-mile estimates.

5. Refer to Columbia Kentucky's response to Staff's Third Request, Item 31. Provide the discretionary percentage selected by the Benefits Committee for the past five years.

6. Provide in Excel spreadsheet format with all formulas, columns, and rows unprotected and fully accessible, the effect on rate base and revenue requirement for removing the Line DE ILI Project from the test year.

7. Refer to the Direct Testimony of David A. Roy (Roy Direct Testimony), page 24 through page 27. For each year from 2017 through 2020, provide the number of cross-bores found and the average cost of a cross-bore repair.

8. For each replacement of first generation plastic pipe completed by Columbia Kentucky in the last five years, provide the location, reason for replacement, and cost to replace.

9. Explain what changes in costs in the forecasted test year were based on the new union contract expectations.

10. For all efficiencies related to O&M identified for the test-year, state whether the efficiency relates to costs that are allocated to Columbia Kentucky by NiSource or

whether the efficiency relates to costs originating with Columbia Kentucky. For each identified efficiency, also state whether Columbia Kentucky expects it to be ongoing.

11. Identify the legal basis used by the American Gas Association to distinguish what percentage of dues paid to it are not deductible for tax purposes.

12. Identify and the provision of NiSource Corporate Services Company's service agreement with Columbia Kentucky that permits Columbia Kentucky to dispute the magnitude of an allocation expense made to Columbia Kentucky by NiSource.

13. Provide the specific federal regulation or regulations which Columbia Kentucky contends require it to change the method of inspection it uses on Line DE. Include in your response a citation to the regulation or regulations as well as a legal analysis of how the regulation requires a change in inspection method for Line DE.

14. Provide the number of feet of pipe of Line DE by diameter.

15. For the most recently completed SMRP, provide a breakout to show the restoration costs associated with each project completed.

16. Explain how Columbia Kentucky is prioritizing projects for inclusion in its SMRP each year. In your response, address whether Columbia Kentucky has a holistic plan to address what is included in the SMRP.

17. Refer to Columbia Kentucky's responses to Commission Staff's First Request for Information, Items 52 and 53. Also, refer to Columbia Kentucky's response to Commission Staff's Second Request for Information, Item 47.

a. Explain why the amount for OMO/OFO Demand Penalty was \$0 in Calendar Year 2020.

b. Explain why no adjustments were made to the nonrecurring charges in the forecasted test-year to normalize the late-payment penalty and the reconnection charge revenue given that there was a moratorium on those items for most of 2020, causing those items to be significantly lower in 2020 when compared to years that are more typical.

c. Provide separately by year, from 2016 to the current date, the number of reconnections attributed to:

(1) Customers who had been disconnected for nonpayment of bills or for violation of Columbia Kentucky's rules and regulations;

(2) Residential customers who request disconnection for which the customer is reconnected within eight months; and

(3) Commercial customers who request disconnection for which the customer is reconnected within eight months.



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Linda C. Bridwell, PE  
Executive Director  
Public Service Commission  
P.O. Box 615  
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DATED NOV 05 2021

cc: Parties of Record

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